

ELECTRONICALLY FILED - 2020 June 4 5:00 PM - SCPSC - Docket # 2019-226-E - Page 1 of 6

**INTERVENOR,
SOUTH CAROLINA SOLAR
BUSINESS ALLIANCE, INC.'S
REQUEST FOR PRODUCTION**

1. That all information shall be provided to the undersigned in the format as requested.
2. That all responses to the below Requests for Production shall be labeled using the same numbers as used herein.
3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Requests for Production in the appropriate sequence.
4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

5. That all exhibits be reduced to an 8 1/2" x 11" format.

6. That each Request be reproduced at the beginning of the response thereto.

7. That DESC provides the undersigned with responses to these Requests for Production as soon as possible but **not later than twenty (20) days from the date of service hereof.**

8. If the response to any Requests for Production is that the information requested is not currently available, state when the information requested will become available.

9. These Requests for Production shall be deemed continuing so as to require DESC to supplement or amend its responses as any additional information becomes available up to and through the date of trial.

10. If a privilege not to answer a Request is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

11. If a refusal to respond to a Request is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

12. Answer each Request on the basis of the entire knowledge of DESC, including information in the possession of DESC or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

13. If any Request cannot be answered in full, respond to the extent possible and specify the reasons for DESC's inability to produce.

14. Please provide a copy of the information responsive to this request in electronic working spreadsheet (Microsoft Excel) format with all data and formulas intact, to the extent feasible.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **“You” or “your” shall refer to, DESC**
2. **The conjunctions “and” and “or” shall be interpreted** in each and every instance as meaning “and/or” and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.
3. **“Document” shall mean** all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA's, Blackberry's or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of DESC and specifically includes the computer and or laptop computers utilized by Representatives of DESC. Media means media, as broadly as the term “media” may be defined, that contains electronic data, as to the Interaction between SCSBA and DESC.
4. **“Identify” or “identity”** used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the same time in question.

5. **“Identify” or “identity”** used with reference to a writing means to state the date, author, type of document (e.g. letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in your possession or subject to their control, state what disposition was made of the document(s).

6. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

REQUEST FOR PRODUCTION

1. Please provide all documents provided to or received from any other party in this Docket, on an informal basis or as part of a formal discovery Response.

2. Please produce all documents relied on or referenced in DESC’s Response to any Interrogatory.

3. Please produce all studies and work papers referenced or relied upon in the preparation of DESC’s IRP.

4. Please produce all documents, including but not limited to input parameters, output files and data sets, related to any capacity expansion modeling software employed by DESC in creating the IRP.

5. Please produce all documents related to cost estimates or quotes received or obtained by DESC for the use or licensing of capacity expansion modeling software.

6. Please produce all documents related to any analysis of potential retirement of coal units operating on the DESC system performed by DESC or a consultant to DESC in the last 3 years.

7. With regard to the emissions and fuel sensitivities discussed on IRP p. 44, please provide all documents relating to:

a. Annual gas prices for the entire modeling period for each of the three forecasts, labeled in nominal or real dollars as appropriate (please provide in tabular format), and labeled as Henry Hub prices or otherwise as appropriate.

b. Annual gas transmission costs for the entire modeling period, labeled in nominal or real dollars as appropriate (please provide in tabular format).

c. Annual CO2 prices for the entire modeling period for each of the two forecasts, labeled in nominal or real dollars as appropriate (please provide in tabular format).

8. In the Conclusion section on IRP p. 59, DESC states that “with a commitment to a more sustainable energy future, the Company needs to upgrade its distribution network through measures such as rolling out Advanced Metering Infrastructure, converting some of its older peaking generation to more reliable and quick- start peaking generation, continuing to expand DSM, and studying transmission system to minimize the impact of eventual steam unit retirements and additional intermittent renewable generation.” With regard to this statement:, please produce all documents related to any quantitative analyses performed by DESC or a consultant to DESC establishing a need or favorable economics on the DESC system for AMI and for conversion of peaking generation to quick-start peaking generation. If no such analysis exists, please explain why the Company believes it needs to take these actions.

9. Please produce all documents related to any study performed by DESC or a consultant to DESC that calculates system ancillary services needs under potential future scenarios considered in the preparation of the IRP, including but not limited to:

- a. Coal unit retirement
- b. Addition of solar PV beyond that currently operating and under contract

10. Please produce all documents relate to any study performed by DESC or a consultant to DESC that estimates expected solar PV curtailment under different scenarios considered in the preparation of the IRP, including but not limited to:

- a. Coal unit retirement
- b. Solar PV currently operating and under contract
- c. Addition of solar PV beyond that currently operating and under contract

[Signature Page Follows]

Respectfully Submitted,

/s/Richard L. Whitt

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Alliance, Inc.

June 4, 2020

Irmo, South Carolina